BELLSOUTH

BellSouth Telecommunications, Inc.

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101/122 M 8 45 November 21, 2000 **Guy M. Hicks** General Counsel

615 214-6301 Fax 615 214-7406

VIA HAND DELIVERY

David Waddell, Executive Secretary Tennessee Regulatory Authority 460 James Robertson Parkway Nashville, TN 37238

> Re: All Telephone Companies Tariff Filings Regarding Reclassification Of Pay Telephone Service As Required By Federal Communications Commission (FCC) Docket 96-128

Docket No. 97-00409

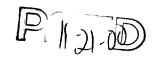
Dear Mr. Waddell:

Enclosed are fourteen copies of BellSouth's Response to the Staff's First Data Request dated October 27, 2000. These responses were originally filed on November 8, 2000. It was discovered today that, although the original was complete, a copier malfunction caused BellSouth's response to Item No. 4 to be omitted from the filing and service copies. Copies of the enclosed complete set have been provided to counsel of record for all parties via facsimile.

Very truly yours,

Guy M. Hicks

GMH:ch Enclosure



BellSouth Public Communications, Inc.

Tennessee Regulatory Authority Docket No. 97-00409

Staff's First Data Requests

October 27, 2000

Item No. 1

Page 1 of 1

REQUEST:

Please provide audited financial statements for the calendar years ended December 31, 1997, 1998, 1999 and year-to-date 2000 for BellSouth Public Communications, Inc. Note: If audited financial statements have not been prepared provide unaudited financial statements.

RESPONSE:

BellSouth objects to this data request. The subject matter of this docket has devolved to one question: Do the PTAS and SmartLine® rates charged by BellSouth Telecommunications meet the FCC's "new services test?" The audited (or unaudited) financial statements of BellSouth Public Communications, a subsidiary of BellSouth Telecommunications have absolutely no relevance to the issue remaining in this docket.

Moreover, the data is highly proprietary, and the direct competitors of BellSouth Public Communications in Tennessee are the members of the Tennessee Payphone Owners Association ("TPOA"). Nor could the data requested by the Staff even be used by the TPOA in this docket, as there is no further argument or briefing contemplated by the procedural schedule.

Nevertheless, and without waiving the foregoing objections, BellSouth is willing to make the requested information available for review (to the extent the requested information exists) by the Tennessee Regulatory Authority Staff pursuant to an appropriate proprietary agreement at a mutually convenient time and location.

BellSouth Public Communications, Inc. Tennessee Regulatory Authority Docket No. 97-00409 Staff's First Data Requests October 27, 2000 Item No. 2 Page 1 of 1

REQUEST: Provide financial statements for BellSouth Public

Communications, Inc. Tennessee payphone operations for the

years ended 1997, 1998, 1999, and year-to-date 2000.

RESPONSE: See response to Item No. 1.

BellSouth Public Communications, Inc. Tennessee Regulatory Authority Docket No. 97-00409 Staff's First Data Requests October 27, 2000 Item No. 3 Page 1 of 1

REQUEST:

Provide the number of payphones in Tennessee served by BellSouth Public Communications, Inc. as of December 31, 1997, 1998, 1999, and October 1, 2000.

RESPONSE:

Dec. 1997 = 17,413; 1998 = 17,284; 1999 = 16,094; Oct. 1, 2000 = 15,308

BellSouth Public Communications, Inc. Tennessee Regulatory Authority Docket No. 97-00409 Staff's First Data Requests October 27, 2000 Item No. 4 Page 1 of 1

REQUEST: Provide the total number of payphones served by BellSouth Public

Communications, Inc. as of December 31, 1997, 1998, 1999, and

October 1, 2000.

RESPONSE: Dec. 1997 = 166,970; 1998 = 166,630; 1999 = 153,780; Oct. 1,

2000 = 146,925

BellSouth Telecommunications, Inc. Tennessee Regulatory Authority Docket No. 97-00409 Staff's First Data Requests October 27, 2000 Item No. 5 Page 1 of 1

REQUEST:

Is the cost study information presented in the testimony of D. Daonne Caldwell filed on September 15, 2000, based on jurisdictionally separated or unseparated costs?

RESPONSE:

The referenced cost study is based on unseparated costs.

CERTIFICATE OF SERVICE

I hereby certify that on November 21, 2000, a copy of the foregoing document was served on the parties of record, as follows:

	Hand Mail	Cynthia Kinser, Esquire Consumer Advocate Division
1	Facsimile	426 5th Avenue, N., 2nd Floor
	Overnight	Nashville, TN 37243
	Hand	T. G. Pappas, Esquire
	Mail	Bass, Berry & Sims
	Facsimile	315 Deaderick Street, Suite 2700
[]	Overnight	Nashville, TN 37238-0002
[]	Hand	James Wright, Esquire
[]	Mail	United Telephone - Southeast
[/	Facsimile	14111 Capitol Blvd.
[]	Overnight	Wake Forest, NC 27587
[]	Hand	Richard Tettlebaum, Esquire
[]	Mail	Citizens Telecommunications
[1	Facsimile	1400 16th St., NW, #500
[]	Overnight	Washington, DC 20036
[]	Hand	Jon Hastings, Esquire
[]	Mail	Boult, Cummings, et al.
[/]	Facsimile	P. O. Box 198062
[]	Overnight	Nashville, TN 37219-8062
[]	Hand	Val Sanford, Esquire
[]	Mail	Gullett, Sanford, Robinson & Martin
	Facsimile	230 Fourth Ave., N., 3d Fl.
[]	Overnight	Nashville, TN 37219-8888
[]	Hand	Henry Walker, Esquire
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Guilford Thornton, Esquire Stokes, Bartholomew, et al. 424 Church St., #2800 Nashville, TN 37219-2323

L. Vincent Williams, Esquire Office of Tennessee Attorney General 425 Fifth Avenue North Nashville, Tennessee 37243

